

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***RESPONSE TO COMMENTS***

on draft conditional major permit No. F-05-029

Valspar Coating Company

Bowling Green, Kentucky

September 29, 2005

Sukhendu Majumdar

Plant I.D. # 21-227-00111

AI # 4123

The notice for the draft conditional major permit F-05-029 was issued on August 1, 2005 in the *Daily News* in Bowling Green, Kentucky for public comment. Comments were received on August 22, 2005 from Reo Hining, plant manager for Valspar Coatings.

The following comments were made by Mr. Hining with a response from the Division after each comment.

1. Permit Application Summary Form, Page 1, Application Type/Permit Activity.

The application type is shown to be a Conditional Major. However, the potential emissions of Volatile Organic Compounds (VOC) is less than 100 tons per year, and the facility has requested limits to avoid the major source threshold for Hazardous Air Pollutant (HAPs), it is Valspar's understanding that the facility's limited emissions will be less than the major source thresholds and therefore, the permit type should be a synthetic minor permit. Valspar requests clarification on why the permit is a Conditional Major Permit verses Synthetic Minor Permit.

*Division's response: The facility has potential of a single Hazardous Air Pollutant (HAP) to be more than 10 tons per year and the facility has requested a federally enforceable limit to restrict single HAP potential emissions to below 10 tons per year, which can only be done in a Conditional Major or major source permit. A synthetic minor permit can be for minor, conditional major or major sources to preclude the applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality (PSD). Thus the source permit is a Conditional Major Permit and does not qualify for Synthetic Minor Permit because the source potential emissions are below the PSD applicability thresholds.*

2. Permit Application Summary Form, Page 1, Miscellaneous.

The permit application submitted by Valspar included Confidential Business Information (CBI). Therefore, Valspar requests checking the box indicating that Confidential Business Information (CBI) submitted in application.

*Division's response: The permit application summary form has been revised, as requested.*

3. Permit Statement of Basis, Page 2, Emission Factors and their source, Emission Table.

The Emission Inventory Improvement Program (EIIP) emission calculations submitted in the permit application are engineering estimates using methods developed and approved by USEPA not plant tests or MSDS as indicated in the draft permit. Moreover, the EIIP method creates an emission factor based on the manufacturing steps for finished goods. Therefore, the emission factors are in units of pounds of VOC or HAP per gallon of coating manufactured, not gallons of raw material used. Therefore, Valspar requests the following changes to the Emission Factor Table. First, that the emission factors are expressed in pounds of VOC/HAP per gallon of coating. Secondly, that the source of the emission factors are engineering estimates.

*Division's response: The permit Statement of Basis has been revised to reflect the emission factor based on engineering estimates and product manufactured.*

4. Statement of Basis, Page 3, Monitoring and Recordkeeping Requirements, "The following records shall be maintained- Monthly usage records for all materials containing HAPs."

For reasons stated above, the emission calculations are based on finished good production, not raw material usage. Therefore, Valspar requests that this be modified to "Monthly production records."

*Division's response: The permit Statement of Basis has been revised, as requested.*

5. Statement of Basis, Page 4, Specific Monitoring Requirements, "The Permittee shall inspect the condition of the bags in each bag house and/or filters in each filter unit at least once every six months."

Valspar believes that a daily visual inspection will identify issues with the duct collection systems and that a semi-annual internal inspection would not be necessary. Therefore, Valspar requests that this condition be removed from the permit.

*Division's response: The condition is not in the permit and was an oversight in the Statement of Basis. Daily inspection is more stringent than an inspection every 6 months. The permit Statement of Basis has been revised, as requested.*

6. Statement of Basis, Page 4, Credible Evidence

Valspar requests further clarification of the permit condition.

*Division's response: Credible evidence pertains to the methods, other than EPA reference methods, that may be used to prove non-compliance.*

7. Conditional Major-Operating Permit, Subject Item Inventory, Page I through vii

The maximum hourly processing rate is appropriate for continuous manufacturing processing. However, Valspar's coating manufacturing processes are batch process and the maximum hourly process rate does not have real meaning. Therefore, the Valspar requests removing the maximum rate/capacity from the subject item inventory.

*Division's response: The maximum hourly processing rate is necessary to determine an emission limit from the formula in the regulations. Referring to the permit, the compliance demonstration method for this limit is based on the monthly process rate divided by the hours of operation that month. Similarly there are monthly monitoring and recordkeeping requirements.*

8. Conditional Major-Operating Permit, AI004123 (Source) General Descriptions, Condition L-1, HAP Limits, Page 1 to 15

Valspar wants to ensure that the National Emission Standard for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing, Subpart HHHHH is not applicable to the facility. As such, Valspar requests clearly indicating that the facility-wide emission limitation for any single HAP shall not exceed 9 tons per 12-month consecutive period and the facility-wide emission limitation for all the combined HAPs shall not exceed 22.5 tons per 12-month consecutive period.

*Division's response: The permit has been revised, as requested.*

9. Conditional Major-Operating Permit, AI004123 (Source) General Descriptions, Condition L-1, Recordkeeping Requirements, "Monthly usage records for all materials containing HAPs," Page 1 of 15

The emission calculations are based on finished goods production not raw material usage, Valspar requests changing the recordkeeping requirement to read "Monthly production records".

*Division's response: The permit has been revised, as requested.*

10. Conditional Major-Operating Permit, EQPT1 (3) Dispersion Tanks, EU04A, Condition T-4, Monitoring Requirements, "The Permittee shall monitor the hours of operation of the unit on a monthly basis", Page 13 of 15

The particulate emissions from the dispersion tank only occur when dry materials are added to the batch. To maintain a log of the hours of operation of the dry material additions for each dispersion tank is excessively burdensome and onerous. Valspar requests changing the monitoring requirements to read "The Permittee shall monitor the hours of operation of the facility on a monthly basis"

*Division's response: The monitoring requirements T-4 reads the way the source requested- on a monthly basis. Refer to the response to comment 7.*

11. Conditional Major-Operating Permit, EQPT1 (3) Dispersion Tanks, EU4A, Condition T-5, Monitoring Requirements, "The Permittee shall perform a qualitative visible observation of the opacity of the emissions from each tank on a monthly basis...opacity shall be determined by EPA Reference Method 9...." Page 13 of 15

Valspar would like some flexibility with regards to the requirement of a Method 9 opacity observation. As such, Valspar requests adding the following language to the permit condition, If visible emissions from the stack are seen, then the opacity shall be determined by EPA Reference

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Method 9 or a deviation will be recorded and reported. In case, an inspection shall be initiated for any necessary repairs.”

*Division’s response: The permit states, “The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a monthly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 or a deviation shall be recorded and reported to DAQ. In either case, an inspection shall be initiated for any necessary repairs.”*